Rochester Tel Center
180 South Clinton Avenue
Rochester, New York 14646-0700

716 777-1028

Michael J. Shortley, III
Senior Corporate Attorney

RochesterTel

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BY OVERNIGHT MAIL

Ms. Donna R. Searcy
Secretary
Federal Communications Commission
1919 M Street, N. W.
Washington, D. C. 20554

Re: CC Docket No. 92-222

Dear Ms. Searcy:

Enclosed for filing please find an original plus nine (9) copies of the Comments of Rochester Telephone Corporation in this proceeding.

To acknowledge receipt, please affix an appropriate notation to the copy of this letter provided herewith for that purpose and return same to the undersigned in the enclosed self-addressed envelope.

Very truly yours,

Michael J. Shortley, III

cc: Policy and Program
Planning Division

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of Amendment of Part 69 Allocation of General Support Facility Costs	)	CC Docket No. 92-222

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COMMENTS OF ROCHESTER
TELEPHONE CORPORATION

JOSEPHINE S. TRUBEK
General Counsel

ROCHESTER TELEPHONE CORPORATION
180 South Clinton Avenue
Rochester, New York 14646
(716) 777-6713

Michael J. Shortley, III
of Counsel

December 3, 1992

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OFFICE OF THE SECRETARY

COMMENTS OF ROCHESTER
TELEPHONE CORPORATION

Introduction and Summary

Rochester Telephone Corporation ("Rochester"), on its behalf and that of its exchange carrier subsidiaries,[1/] submits these comments in response to the Commission's Notice of

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1/ AuSable Valley Telephone Company, Inc., Breezewood Telephone Company, C, C & S Telco, Inc., Canton Telephone Company, Citizens Telephone Company, Inc., DePue Telephone Company, Enterprise Telephone Company, Fairmount Telephone Company, Inc., Highland Telephone Company, Inland Telephone Company, Lakeshore Telephone Company, Lakeside Telephone Company, Lakewood Telephone Company, Lamar County Telephone Company, Inc., Midland Telephone Company, Mid-South Telephone Company, Inc., Midway Telephone Company, Minot Telephone Company, Mondovi Telephone Company, Monroeville Telephone Company, Inc., Mt. Pulaski Telephone & Electric Company, Ontonagon County Telephone Company, Orion Telephone Exchange Association, Oswayo River Telephone Company, Prairie Telephone Company, S & A Telephone Company, Inc., The Schuyler Telephone Company, Seneca-Gorham Telephone Corporation, Southland Telephone Company, St. Croix Telephone Company, The Statesboro Telephone Company, Sylvan Lake Telephone Company, Inc., The Thorntown Telephone Company, Inc., Urban Telephone Corporation, Viroqua Telephone Company, Vista Telephone Company of Iowa and Vista Telephone Company of Minnesota.

Proposed Rulemaking in this proceeding.[2/]

Rochester generally agrees with the Commission's proposal to eliminate the Category 1.3 Cable and Wire Facilities exclusion from the factors utilized to allocate General Support Facility ("GSF") costs.[3/] Because Category 1.3 relates to investment in common line facilities, section 69.307 of the Commission's rules[4/] overallocates GSF costs to the special access and traffic sensitive switched access baskets and underallocates those costs to the common line basket. As the Commission properly recognizes, such support flows are not sustainable in the face of increasing competition for special access services.[5/] Thus, the proposed amendment of section 69.307 is a step in the right direction.

The proposed change to the apportionment factors, however, is itself an insufficient response to this increasingly competitive environment. In addition to amending

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2/ Expanded Interconnection with Local Telephone Company Facilities; Amendment of Part 69 Allocation of General Support Facility Costs, CC Dkt. Nos. 91-141 and 92-222, Report and Order and Notice of Proposed Rulemaking, FCC 92-440 (released October 19, 1992).

The Report and Order portions of the Commission's decision are cited herein as "Report and Order." The Notice of Proposed Rulemaking portions of the decision are cited herein as "NPRM." The NPRM is contained at ¶¶ 267-69.

3/ Id., ¶ 267.

4/ 47 C.F.R. § 69.307.

5/ NPRM, ¶ 269.

section 69.307, the Commission must permit price cap exchange carriers to adjust their price cap indices and rates to reflect the new cost allocations among the price cap baskets. Only in this manner will price cap carriers be able to align their rates more closely with the economic costs of providing service. Merely reassigning costs among the price cap baskets without permitting price cap carriers to adjust their indices and rates accordingly will serve little useful purpose.

In addition, the Commission must recognize that it cannot view its rules governing the provision of special access services in isolation. The Commission is proposing that switched access collocation be in place in less than one year.[6/] Although the Commission concluded in the NPRM that the GSF cost misallocation is the only identifiable support flow contained within the special access basket,[7/] it recognizes that additional -- and probably more significant -- support flows are embedded in traffic sensitive switched access

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6/ See Expanded Interconnection with Local Telephone Company Facilities; Amendment of Part 36 of the Commission's Rules and Establishment of a Joint Board, CC Dkt. Nos. 91-141 (Phases I & II) and 80-286, Second Notice of Proposed Rulemaking, FCC 92-441 (released Oct. 16, 1992) ("Second Notice").

7/ NPRM, ¶ 267.

rates.[8/] Rochester urges the Commission to enlarge its directive to the Joint Board to permit it to undertake a comprehensive review of the existing separations procedures and urges the Commission itself to begin a thorough study of the existing cost allocation and access structure rules.[9/]

Finally, the Commission requests comment on how it should structure a contribution charge in the event that it declines to adopt the amendment to Part 69 proposed herein. Such action would constitute a decidedly second-best alternative. Nonetheless, if the Commission decides to retain the existing apportionment factors, it should be faithful to its conclusion that all users of the network contribute to any public policy support flows embedded in current rate structures and levels.[10/] Therefore, if the Commission continues this support flow, it should permit exchange carriers to establish rate elements such that all users of exchange carrier special access services contribute to these public policy objectives.

8/ Transport Rate Structure and Pricing, CC Dkt. No. 91-213, Report and Order and Further Notice of Proposed Rulemaking, FCC 92-441, ¶¶ 133-35 (released Oct. 16, 1992) ("Transport Further Notice").

9/ In the Second Notice, the Commission directed the Joint Board to consider only those separations changes that may be necessary as a result of the availability of expanded interconnection. The Commission expressly declined to permit the Joint Board to consider broader separations issues. See Second Notice, ¶ 54. The Commission also declined to institute a comprehensive review of its cost allocation and access structure rules. See Transport Further Notice, ¶ 135.

10/ Report and Order, ¶ 143.

Argument

I. THE COMMISSION SHOULD ADOPT ITS PROPOSED REALLOCATION OF GSF COSTS.

The Commission correctly concludes that the current method of allocating GSF costs substantially underallocates those costs to the common line basket.[11/] When the Commission adopted the Category 1.3 exclusion, it did so to ensure that its then-new Part 36 separations rules did not result in significant revenue requirement shifts among access categories.[12/] The Category 1.3 exclusion prevented a revenue requirement shift to the common line category.

Whatever the merits of that objective in 1987, circumstances have changed. Support flows embedded in exchange carrier rate levels and structures are not sustainable in an era of increased local exchange competition. Artificially raising rates for those services provided by exchange carriers

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11/ NPRM, ¶ 267.

Moreover, as the Commission correctly notes (id., ¶ 267 n.625), the section 69.307 allocators have collateral effects on the allocation of other investment and expense. For example, section 69.401 of the Commission's rules, 47 C.F.R. § 69.401, apportions plant specific operations expense in account 6120 on the basis of the apportionment of GSF investment.

12/ Amendment of Part 69 of the Commission's Rules and Regulations, Access Charges, To Conform It with Part 36, Jurisdictional Separations, CC Dkt. No. 87-113, Report and Order, 2 FCC Rcd. 6447 (1987).

that are most vulnerable to competition will invite customers to seek substitutes and will induce uneconomic entry by other providers.13/

Moreover, by changing the apportionment factors to include Category 1.3 investment, the Commission will align costs more closely with the services that cause those costs be incurred. Exchange carriers require general support facilities, such as land and buildings, to provide all of their services. Including common line investment among the GSF apportionment factors will result in at least some GSF costs being assigned to the common line basket, thereby resulting in a more economically appropriate assignment of GSF costs.

However, this change in the apportionment factors itself is not a complete solution. The existence of caps on the end user common line rate elements results in exchange carriers recovering a portion of their non-traffic sensitive costs through traffic sensitive carrier common line charges. These costs are not traffic sensitive and, therefore, should be recovered solely through usage insensitive rate elements. Although the proposed GSF reallocation is economically appropriate, it is still only an interim measure. The

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13/ The Rochester area, for example, is only the thirty-fourth largest standard Metropolitan Statistical Area in the nation. Rochester, however, has two competitive access providers in operation. Thus, this phenomenon is not limited solely to the Nation's largest metropolitan areas.

Commission must continue to move the recovery of non-traffic sensitive costs to the end user common line rate elements. However, the Commission's proposal constitutes a step in the right direction and should be adopted.

II. THE COMMISSION SHOULD PERMIT PRICE CAP EXCHANGE CARRIERS TO ADJUST THEIR INDICES AND RATES TO REFLECT THE PROPOSED COST REALLOCATION.

The Commission recognizes that the current GSF cost misallocation is not tenable in light of the competitive environment in which exchange carriers must offer their access services.[14/] A necessary conclusion from this proposition is that exchange carriers must have the flexibility to adjust their prices to reflect more accurately the economic costs of providing their services.

However, price cap carriers established their initial rates under price caps essentially based upon the current Part 69 cost allocation rules. To the extent that these rules contain significant cost misallocations, price cap carriers' current rates reflect those misallocations. Moreover, the banding limitations -- particularly the subindex requirements for DS-1 and DS-3 services -- will preclude exchange carriers from reflecting fully the proposed reallocation of GSF costs.

14/ NPRM, ¶ 269.

Thus, if the Commission intends to modify its Part 69 cost allocation rules to moderate the uneconomic pricing of exchange carrier services, it must permit price cap exchange carriers to adjust their price cap indices and rates in all of the affected baskets to reflect the proposed GSF cost reallocation. Only by permitting exchange carriers to adjust their rates to reflect this new assignment of GSF costs will exchange carriers be able to ameliorate existing price imbalances caused by the current GSF apportionment factors. Unless the Commission permits such rate realignments to occur, it cannot meet its stated objective -- more economically rational pricing of exchange carrier services -- in proposing the reapportionment of GSF costs in the first instance.

III. THE COMMISSION SHOULD UNDERTAKE A COMPREHENSIVE REVIEW OF EXISTING SEPARATIONS, COST ALLOCATION AND ACCESS STRUCTURE RULES.

The proposed reallocation of GSF costs to the common line basket is only a start. With the acceleration of the Commission's initiatives to unbundle the network further and to foster increased competition, the Commission must undertake a comprehensive review of the existing separations, cost assignment and access structure rules.

The Commission is proposing that exchange carriers file switched access collocation tariffs to become effective

November 1, 1993.[15] The Commission has also indicated that it is prepared to provide exchange carriers with some limited pricing flexibility[16] and to take limited steps to correct existing cost misallocations.[17] However, the Commission expressly declined to initiate a comprehensive review of its cost allocation and access structure rules at this time.[18] The existing access charge structure remains essentially intact. Yet, the distinctions between the baskets -- particularly traffic sensitive switched and special access -- have blurred. Special and switched access transport facilities are easily substitutable. This fact renders the structure of the existing price cap baskets largely unsustainable. As such, the Commission should consider its proposed reallocation of GSF costs to the common line basket as an interim measure only, subject to the outcome of a comprehensive proceeding considering these broader issues.

Similarly, the current separations rules remain largely unchanged. Although the Commission has referred certain issues to the Joint Board, the scope of the referral is narrow. The

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15/ Second Notice, ¶ 37.

16/ See Report and Order, ¶¶ 174-217; Transport Further Notice, ¶¶ 70-77.

17/ NPRM, ¶¶ 267-69.

18/ See Transport Further Notice, ¶ 135.

Commission stated that:

> [it did] not intend the Joint Board to consider broader separations issues in the context of this referral. Such matters should be the subject of a comprehensive separations review proceeding.[19/]

The Commission should provide the Joint Board with that mandate now. At the same time, the Commission itself should begin a thorough study of the Part 69 access structure and cost assignment rules.

IV. THE COMMISSION SHOULD REQUIRE ALL SPECIAL ACCESS PROVIDERS TO CONTRIBUTE TO THE RECOVERY OF ANY CONTRIBUTION CHARGE.

The Commission has requested comment on how it should structure a contribution element in the event that it decides not to adopt its proposed reallocation of GSF costs.[20/] Such a step would constitute a decidedly second-best alternative. The Commission should endeavor to assign costs in an economically rational manner. Thus, to the extent that the Commission identifies specific cost misallocations, it should correct them.

However, if the Commission wishes to adopt the contribution approach, it must ensure that all special access providers contribute to the recovery of this support flow. The Commission cannot continue to require exchange carriers to compete on the basis of costs that are not economically related to the services in question and that their competitors do not

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19/ Second Notice, ¶ 55.

20/ NPRM, ¶ 269.

face. Such an approach would artificially distort competition by providing a price umbrella under which less efficient competitors could safely price their services. Indeed, the Commission has concluded that:

> all market participants should contribute to regulatorily mandated support flows reflected in the LECs' rates for services subject to competition.[21/]

If the Commission adopts a contribution charge, it should structure that rate element to ensure that all users of exchange carrier special access services bear a portion of that support flow. To accomplish this result, the Commission should apply any contribution charge to the first channel termination or cross-connect facility for each leg of a special access circuit. In this manner, competitive access providers and others that interconnect with exchange carrier special access facilities will contribute toward the recovery of this support flow. Moreover, by applying a contribution charge only to the first channel termination or cross-connect facility, the Commission will ensure that exchange carriers and other competitors contribute to this support flow on an equal basis.

21/ Report and Order, ¶ 143.

Conclusion

For the foregoing reasons, the Commission should adopt its proposed reallocation of GSF costs. In the alternative, the Commission should adopt a contribution element along the lines suggested in these comments. Finally, the Commission, in conjunction with the Joint Board, should commence a comprehensive review of the existing separations, cost allocation and access structure rules.

Respectfully submitted,

Josephine S. Trubek/LMZ

JOSEPHINE S. TRUBEK
General Counsel

ROCHESTER TELEPHONE CORPORATION
180 South Clinton Avenue
Rochester, New York 14646
(716) 777-6713

Michael J. Shortley, III
of Counsel

December 3, 1992

(3108P)

<u>Certificate of Service</u>

I hereby certify that, on this 3d day of December, 1992, copies of the foregoing Comments of Rochester Telephone Corporation were served by first-class mail, postage prepaid, upon the parties on the attached service list.

Michael J. Shortley, III
Attorney for Rochester
Telephone Corporation

SERVICE LIST

James A. Blaszak
Charles C. Hunter
Gardner, Carton & Douglas
1301 K St., N.W.
Suite 900 - East Tower
Washington, D.C. 20003
Attorneys for Ad Hoc Tele-
communications Users Committee

Brian K. Sulmonetti
Director, Regulatory Affairs
Advanced Telecommunications Corp.
Suite 2100
945 East Paces Ferry Road
Atlanta, GA 30326

Peter A. Rohrbach
Gerald C. Oberst, Jr.
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004
Attorneys for Advanced Tele-
communications Group

Floyd S. Keene
Brian R. Gilomen
Mark R. Ortlieb
Ameritech
Legal Department
2000 W. Ameritech Center Dr. 4H82
Hoffman Estates, IL 60196-1025

Roy L. Morris
Deputy General Counsel
Allnet Communications
Services, Inc.
1990 M Street, N.W. Suite 500
Washington, D.C. 20036

Carolyn C. Hill
Federal Regulatory Counsel
ALLTELL Service Corporation
Suite 1000
1710 Rhode Island Ave., N.W.
Washington, D.C. 20036

Laura Montgomery
Arter & Hadden
1801 K St., N.W., Suite 400K
Washington, D.C. 20006
Attorney for America's Carriers
Telecommunications Association

John C. Shapleigh
President and General Counsel
Association for Local
Telecommunications Services
Suite 1050
1150 Connecticut Avenue, N.W.
Washington, D.C. 20036

Carvel B. Tefft, President
Atlantic Connections, Ltd.
104 Congress St., Suite 202
Portsmouth, NH 03801

Debra Buruchian
Vice President and
General Manager
ATX Telecommunications Services
101 South 39th Street
Philadelphia, PA 19104

Stephen P. Bowen
General Counsel
Bay Area Teleport
Suite 260
1141 Harbor Bay Parkway
Alameda, California 94501

Michael D. Lowe
J. Manning Lee
Bell Atlantic
1710 H Street, N.W.
Washington, D.C. 20006

William B. Barfield
Richard M. Sbaratta
BellSouth
Suite 1800
1155 Peachtree Street, N.E.
Atlanta, GA 30367-6000

Philip L. Verveer
Sue D. Blumenfeld
Willkie Farr & Gallagher
1155 21st St., N.W., Suite 600
Washington, D.C. 20036
Attorneys for Cable & Wireless
Communications, Inc.

Peter Arth, Jr.
Edward W. O'Neill
Ellen S. Levine
505 Van Ness Avenue
San Francisco, CA 94102
Attorneys for the People of the
State of California and the
Public Utilities Commission of
the State of California

Mitchell T. Brecher
Dow, Lohnes and Albertson
1255 Twenty-third Street, N.W.
Washington, D.C. 20037
Attorney for Capital Network
System, Inc.

Barbara J. Stonebraker
Senior Vice President -
External Affairs
Cincinnati Bell Telephone
201 E. Fourth St., 102 - 300
P. O. Box 2301
Cincinnati, OH 45201

William D. Baskett III
Thomas E. Taylor
David S. Bence
Frost & Jacobs
2500 Central Trust Center
201 E. Fifth Street
Cincinnati, OH 45202
Attorneys for Cincinnati Bell
Telephone Company

Ellen S. Deutsch
Senior Counsel
Citizens Utilities Company
of California
1035 Placer Street
Redding, CA 96001

Brad A. Evans
Executive Vice President
City Signal, Inc.
250 Monroe NW, Suite 110
Grand Rapids, MI 49503

Robert J. Aamoth
Michael R. Wack
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036
Attorneys for Competitive
Telecommunications Association

Genevieve Morelli
Vice President and General Counsel
Competitive Telecommunications
Association
Suite 220
1140 Connecticut Ave., N.W.
Washington, D.C. 20036

Ellyn Elise Crutcher
Consolidated Network Inc.
121 S. 17th Street
Mattoon, Illinois 61938

Howard C. Davenport
Daryl L. Avery
Peter G. Wolfe
Public Service Commission
of the District of Columbia
450 Fifth Street, N.W.
Washington, D.C. 20001

J. Mike Surratt
Duke Power Company
P. O. Box 1006
Charlotte, NC 28201-1006

James U. Troup
Arter & Hadden
1801 K Street, N.W., Suite 400K
Washington, D.C. 20006
Attorney for Elkhart Telephone Co.

Richard C. Bellak
Associate General Counsel
Florida Public Service Commission
101 East Gaines Street
Tallahassee, Florida 32399-0862

Robert C. MacKichan, Jr.
Vincent L. Crivella
Michael J. Ettner
General Services Administration
18th & F Streets, N.W., Room 4002
Washington, D.C. 20405

Richard McKenna, HQE03J36
GTE Service Corporation
P.O. Box 152092
Irving, TX 75015-2092

Gail L. Polivy
GTE Service Corporation
1850 M Street, N.W., Suite 1200
Washington, D.C. 20036

John P. Kelliher
Special Assistant Attorney General
Illinois Commerce Commission
180 N. LaSalle Street, Suite 810
Chicago, Illinois 60601

Larry L. Cooper
Senior Manager Regulatory Services
Illinois Consolidated
Telephone Company
121 South 17th Street
Mattoon, Illinois 61938

Brian R. Moir
Fisher, Wayland, Cooper and Leader
1255 23rd Street, N.W., Suite 800
Washington, D.C. 20037-1170
Attorneys for International
Communications Association

James U. Troup
Arter & Hadden
1801 K St., N.W., Suite 400K
Washington, D.C. 20006
Attorney for Iowa Network
Services, Inc.

James D. Heflinger
Vice President and General Counsel
LiTel Telecommunications Corp.
4650 Lakehurst Court
Dublin, OH 43017

Larry A. Blosser
Donald J. Elardo
Regulatory Law Department
MCI World Headquarters
1801 Pennsylvania Ave., N.W.
Washington, D.C. 20036

Richard Heitmann
Angel M. Cartagena
Metromedia Communications Corp.
1 Meadowlands Plaza
East Rutherford, NJ 07073

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson
555 13th St., N.W.
Washington, D.C. 20004
Attorneys for Metromedia
Communications Corp.

Andrew D. Lipman
Russell M. Blau
Swidler & Berlin, Chartered
3000 K Street, N.W.
Washington, D.C. 20007
Attorneys for Metropolitan
Fiber Systems, Inc.

Paul Rodgers
Charles D. Gray
James Bradford Ramsay
National Association of Regulatory
Utility Commissioners
1102 ICC Building
Post Office Box 684
Washington, D.C. 20044

Richard A. Askoff
National Exchange Carrier
Association, Inc.
100 South Jefferson Road
Whippany, NJ 07981

David Cosson
L. Marie Guillory
National Telephone Cooperative Association
2626 Pennsylvania Ave., N.W.
Washington, D.C. 20037

William J. Cowan
General Counsel
New York State Department of Public Service
Albany, New York 12223

Robert DeBroux
Manager-Regulatory Affairs
NorLight
579 D'Onofrio Drive, Suite 200
Madison, WI 53719

Amy A. Gross
NYCOM Information Services, Inc.
5 High Ridge Park
Stamford, CT 06905

Patrick A. Lee
Joseph DiBella
NYNEX
120 Bloomingdale Road
White Plains, NY 10605

Lisa M. Zaina
General Counsel
OPASTCO
2000 K Street, N.W., Suite 205
Washington, D.C. 20006

James P. Tuthill
John W. Bogy
Pacific Bell/Nevada Bell
Room 1530-A
140 New Montgomery Street
San Francisco, CA 94105

Stanley J. Moore
Pacific Bell/Nevada Bell
1275 Pennsylvania Ave., N.W.
Washington, D.C. 20004

Nicholas L. Kottyan
Phone America of Carolina, Inc.
500 Clanton Road, Suite K
Charlotte, North Carolina 28217

Francine J. Berry
American Telephone & Telegraph Company
295 North Maple Avenue
Room 3244J1
Basking Ridge, NJ 07920

Dan Detampel, President
Schneider Communications, Inc.
P. O. Box 2475
3061 S. Ridge Road
Green Bay, WI 54306-2475

E. William Kobernusz
Vice President - Regulatory
The Southern New England Telephone Company
227 Church St. - 15th Floor
New Haven, CT 06510-1806

Douglas Hanson
President
Southern Pacific Telecommunications Company
60 Spear Street, Suite 700
San Francisco, California 94105

Durward D. Dupre
Richard C. Hartgrove
Thomas A. Pajda
Southwestern Bell
Room 2114
1010 Pine Street
St. Louis, MO 63101

Douglas H. Hanson
SP Telecom
60 Spear St., Suite 700
San Francisco, CA 94105

Larry Van Ruler
Tallon, Cheeseman and Assoc., Inc.
3918 Betty Drive, Suite H
Colorado Springs, CO 80907

Andrew O. Isar
Telecommunications Marketing Assn.
P. O. Box 8361
McLean, VA 22106-8361

M. B. Gray
Telecommunications Opportunities Research
Pine Brook Hills
335 Wild Horse Circle
Boulder, CO 80304

Randall Veltkamp, President
Teledial America, Inc.
250 Monroe NW, Suite 650
Grand Rapids, MI 49503-2215

Robert C. Atkinson
J. Scott Bonney
Alex J. Harris
Teleport Communications Group
One Teleport Drive, Suite 301
Staten Island, NY 10311

Joseph P. Benkert
Holme Roberts & Owen
1700 Lincoln, Suite 4100
Denver, CO 80203
Attorneys for Teleport Denver, Ltd.

Jay C. Keithley
Vice President - Law and External Affairs
The United Telephone System Companies
1850 M Street, N.W., Suite 1100
Washington, D.C. 20036

W. Richard Morris
The United Telephone System Companies
P. O. Box 11315
Kansas City, MO 64112

Leon M. Kestenbaum
H. Richard Juhnke
US Sprint Communications Company Limited Partnership
1850 M Street, N.W., 11th Floor
Washington, D.C. 20554

Lawrence E. Sarjeant
James T. Hannon
U S West
1020 19th Street, N.W.
Suite 700
Washington, D.C. 20036

Martin T. McCue
Linda Kent
United States Telephone Assn.
900 19th Street, N.W., Suite 800
Washington, D.C. 20006-2105

Joseph W. Miller
Williams Telecommunications Group, Inc.
Suite 3600
One Williams Center
P.O. Box 2400
Tulsa, OK 74102

Peter A. Rohrbach
Karis A. Hastings
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004
Attorneys for Williams Telecommunications Group, Inc.